TROY LAW, PLLC
*Attorneys for Plaintiffs, the
proposed FLSA Collective and
potential Rule 23 Class*
John Troy (JT 0481) admitted by
pro hac vice
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**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

------------------------X

WEIGANG WANG and HAILONG YU,
*individually and on behalf of
others similarly situated,*
                        Plaintiffs,

            -against-
CHAPEI LLC d/b/a Wok Empire,
CHA LEE LO, and
JOHN DOES #1-10
                        Defendants.

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Case No: 15-cv-2950

**COLLECTIVE ACTION UNDER
29 U.S.C. § 216(B) &
F.R.C.P. RULE 23 CLASS
ACTION**

**DECLARATION OF LINA
FRANCO, ESQ.**

I, Lina Franco, Esq., an attorney admitted to practice before the United States District

Court for the District of New Jersey, hereby declare, under penalty of perjury, as follows:
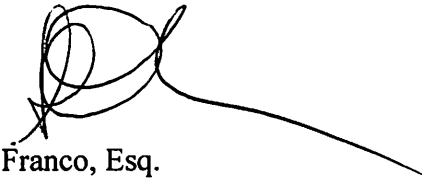
1. I am associated with the law firm Troy Law, PLLC, counsel for the Plaintiffs. I have

    personal knowledge of the following facts.

2. The deadline to file a motion of reconsideration of the Court's August 12, 2016 Order

    was August 26, 2016.

3. I submit this declaration detailing the failed attempts that I made to electronically file

    the motion for reconsideration.

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4. On August 26, 2016 at 5:00pm, I attempted to electronically file the motion for reconsideration on the United States District Court for the District of New Jersey's Electronic Case Filing ("ECF") system.

5. However, due to a technical failure with the ECF system I was unable to file the motion for reconsideration.

6. At 6:30pm on the same date, I again attempted to file said documents and again I was unable to do so as the system was still not running properly.

7. On August 27, 2016, when the ECF system was back up and functioning I filed the motion for reconsideration.

Date: Flushing, New York
       August 29, 2016

Respectfully submitted,
TROY LAW, PLLC

By:

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collective action members
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